

# KAPLAN HECKER & FINK LLP

350 FIFTH AVENUE | SUITE 7110  
NEW YORK, NEW YORK 10118  
TEL (212) 763-0883 | FAX (212) 564-0883  
WWW.KAPLANHECKER.COM

DIRECT DIAL 212.763.0889  
DIRECT EMAIL shecker@kaplanhecker.com

March 23, 2020

**BY ECF**

The Honorable Margo K. Brodie  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201


*Re: Federal Defenders of New York v. Federal Bureau of Prisons*, No. 19 Civ. 660  
(E.D.N.Y.)

Dear Judge Brodie:

We write on behalf of Plaintiff Federal Defenders of New York, Inc. in the above-referenced action. Attached to this letter is the proposed order that we offered to prepare at the conclusion of yesterday's conference for Your Honor's consideration. Tr. 22. The proposed order reflects the appointment of the Honorable Loretta Lynch as mediator and sets out the basic powers that Your Honor suggested she would have. Tr. 8-10.

We look forward to discussing any additional powers or procedures that might contribute to the Honorable Loretta Lynch's efforts at facilitating the adoption of policies for dealing with ongoing and future emergencies, and ensuring that the Bureau of Prisons takes the necessary steps to protect the rights of inmates and their counsel.

Respectfully submitted,

  
\_\_\_\_\_  
Sean Hecker

cc: Counsel of Record (by ECF)